

30(b) (6) Taser International - July 24, 2017  
Michael Gish

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
(HOUSTON DIVISION)

KAREN TAYLOR, )  
vs. Plaintiff, ) Case No.  
TASER INTERNATIONAL, INC., ) 4:17-cv-00673-GHM  
Defendant. )  
\_\_\_\_\_  
)

VIDEOTAPED 30(b) (6) DEPOSITION OF  
TASER INTERNATIONAL, INC.  
BY MICHAEL GISH

Carefree, Arizona

July 24, 2017

Prepared by:

Gerard T. Coash, RPR, RMR  
Certified Reporter  
Certification No. 50503

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10:27:59 1 the surrogate.

10:28:01 2 BY MR. VICKERY:

10:28:01 3 Q. Do you do swine testing on the effect on the  
10:28:06 4 muscles of the pigs?

10:28:09 5 A. Yes.

10:28:09 6 Q. And on the cardiac rhythms, of course?

10:28:14 7 A. Of course.

10:28:14 8 Q. So you're looking at both the safety from a  
10:28:16 9 cardiac standpoint and the efficacy in terms of  
10:28:20 10 incapacitating the muscles, true?

10:28:23 11 A. That is correct.

10:28:24 12 Q. Because the goal, in terms of protecting a police  
10:28:28 13 officer, is to have a weapon that will control the subject  
10:28:37 14 or suspect through neuromuscular incapacitation rather  
10:28:42 15 than resorting to psychological factors or pain, isn't it?

16 MS. NGUYEN: Object to form and foundation.

10:28:45 17 THE WITNESS: That is correct.

10:28:45 18 BY MR. VICKERY:

10:28:45 19 Q. Okay. Now, last year you were quoted publicly as  
10:28:51 20 saying the -- your new consumer weapon, the TASER pulse,  
10:28:55 21 has the same stopping power as the commercial. And we're  
10:28:58 22 not going to talk a lot about the pulse, but I want to  
10:29:04 23 know what you meant when you used the word "stopping  
10:29:06 24 power."

10:29:08 25 MS. NGUYEN: Object to form and foundation.

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10:29:09 1 THE WITNESS: It uses the same circuit, in  
10:29:12 2 principle, as the X2 circuit.

10:29:15 3 BY MR. VICKERY:

10:29:15 4 Q. So is it rated at 63 microcoulombs, plus or  
10:29:20 5 minus 9?

10:29:23 6 A. It is not.

10:29:23 7 Q. What's it -- what's it out- -- or charge output?

10:29:34 8 A. I think it's about 90 microcoulombs.

10:29:38 9 Q. 90?

10:29:39 10 A. 90, I think.

10:29:40 11 Q. Okay. So actually higher than the X2?

10:29:45 12 MS. NGUYEN: Object to form and foundation.

13 BY MR. VICKERY:

10:29:47 14 Q. Is that true?

10:29:48 15 A. Yes.

10:29:49 16 Q. How does that same waveform or circuit produce a  
10:29:53 17 higher charge output?

10:30:01 18 A. We update the firm wear. And the circuit is  
10:30:09 19 slightly different. But fundamentally, it's the same  
10:30:11 20 circuit.

10:30:12 21 Q. Is it the Oslo circuit?

10:30:15 22 A. Fundamentally, yes.

10:30:16 23 Q. And when you -- when you developed the Oslo  
10:30:22 24 circuit to incorporate and weaponize into the X2, did you  
10:30:26 25 test it on swine?

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11:02:23 1 state your question again.

11:02:24 2 BY MR. VICKERY:

11:02:24 3 Q. Well, let's take both parts of it.

11:02:26 4 The -- both the X26 and the M26 have proven  
11:02:32 5 effective at inca- -- incapacitating even the most  
11:02:36 6 aggressive subjects, haven't they?

11:02:39 7 A. According --

11:02:39 8 MS. NGUYEN: Object to form and foundation.

11:02:40 9 THE WITNESS: According to this -- according  
11:02:42 10 to this, it says right there.

11:02:44 11 BY MR. VICKERY:

11:02:44 12 Q. I know.

11:02:44 13 And I'm asking you, according to your  
11:02:46 14 experience with the company, that's certainly true, isn't  
11:02:48 15 it?

11:02:49 16 MS. NGUYEN: Object to form and foundation.

11:02:52 17 This is not a topic for which this witness  
11:02:55 18 has been designated.

11:02:56 19 If you know.

11:03:14 20 THE WITNESS: Yes, I believe that to be  
11:03:15 21 true.

11:03:15 22 BY MR. VICKERY:

11:03:16 23 Q. And it's been the consistent position of your  
11:03:20 24 company for many, many years that neither of those  
11:03:23 25 devices, the M26 or the X26, posed any appreciable risk of

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11:03:29 1 cardiac safety to the suspect, hasn't it?

11:03:31 2 MS. NGUYEN: Object to form and foundation.

11:03:32 3 That's completely irrelevant. And he's not designated on

11:03:34 4 that topic.

11:03:35 5 You don't have to answer.

11:03:37 6 THE WITNESS: I'm not --

11:03:37 7 MS. NGUYEN: You don't have to answer.

11:03:41 8 THE WITNESS: Okay.

9 BY MR. VICKERY:

11:03:45 10 Q. Tell me something, Mr. Gish. Does it make any

11:03:50 11 sense to you whatsoever that we should be arming

11:03:56 12 housewives with more powerful weapons than police

11:03:59 13 officers?

11:03:59 14 MS. NGUYEN: Object to form and foundation.

11:03:59 15 You don't have to answer that question.

11:04:01 16 MR. VICKERY: He doesn't have to answer that

11:04:03 17 question?

11:04:04 18 MS. NGUYEN: No. You're asking opinion

11:04:06 19 information at this point. And he has not been

11:04:08 20 designated -- it doesn't fall within any of the topics

11:04:10 21 that he's been designated. That's improper questioning.

11:04:13 22 MR. VICKERY: Thank you for coming.

11:04:36 23 I have no further questions for this man

11:04:38 24 today.

11:04:41 25 MS. NGUYEN: I don't have any follow-up.

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1 STATE OF ARIZONA )

2 COUNTY OF MARICOPA )

3 BE IT KNOWN the foregoing deposition was  
4 taken by me pursuant to stipulation of counsel; that I was  
5 then and there a Certified Reporter of the State of  
6 Arizona, and by virtue thereof authorized to administer an  
7 oath; that the witness before testifying was duly sworn by  
8 me to testify to the whole truth; notice was provided that  
9 the transcript was available for signature by the  
10 deponent; that the questions propounded by counsel and the  
11 answers of the witness thereto were taken down by me in  
12 shorthand and thereafter transcribed into typewriting  
13 under my direction; that the foregoing pages are a full,  
14 true, and accurate transcript of all proceedings and  
15 testimony had and adduced upon the taking of said  
16 deposition, all to the best of my skill and ability.

17 I FURTHER CERTIFY that I am in no way related to  
18 nor employed by any parties hereto nor am I in any way  
19 interested in the outcome hereof.

20 DATED at Phoenix, Arizona, this 31st day of July,  
21 2017.

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24 Gerard T. Coash, RMR  
Certified Reporter #50503

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